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The Honorable Jocelyn G. Boyd
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Docket No. 2009-220-C. Frontier Communications of the Carolinas, LLC –
Service Outage in Georgetown County.

Dear Ms. Boyd:

As a result of the service outage last October in the St. Luke's community of Georgetown County, Frontier has undertaken a review of other Reltec Digital Loop Carrier equipment currently used in its South Carolina network. Frontier has identified six other Reltec systems serving a total of approximately 400 lines. Three of these systems are located in Frontier's Myrtle Beach exchanges, and the others are in the Georgetown, Pawleys Island and Sumter exchanges.

Frontier has reviewed the 2019 trouble ticket data for each of these six locations and compared the data with that from the equipment that was replaced in the St. Luke community last November. In all cases, there were significantly fewer trouble tickets for each of the remaining Reltec systems, both in actual numbers as well as proportionately to the number of lines programmed in each system. Furthermore, the nature of the trouble tickets for the St. Luke equipment was largely of a different nature than those from the other systems. While the St. Luke trouble tickets listed many instances of various problems sending and receiving calls, the

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trouble tickets for the remaining Reltec equipment did not include a predominance of that type of problem.

Frontier also physically inspected each of the remaining Reltec systems. Frontier found no issues indicating that the equipment was in poor condition or would be likely to experience a major failure. Frontier did identify some minor repair work and site cleanup unrelated to the provisioning of service, and Frontier will address these minor issues as time permits.

Based on Frontier's review of trouble ticket data and physical inspection, Frontier does not believe there is a significant risk that the remaining Reltec equipment will experience a failure similar to that of the St. Luke equipment last year. Frontier also does not believe functioning equipment should be replaced simply because of its age.

Nonetheless, Frontier has identified one of the remaining Reltec systems as having a readily available alternative already on site and plans to transition customers on those two systems to alternate options over coming months. This system is located in the Myrtle Beach area and currently serves approximately 100 customers. Because this work is somewhat labor intensive, Frontier plans to work on this transition over the coming months as time permits.

CONCLUSION

While no service provider, including Frontier, can guarantee that any equipment will never fail, there is no indication that the current Reltec equipment is in need of immediate replacement. If any such failure does occur, Frontier will quickly restore service.

Please let me know if Frontier can provide additional information regarding this matter.

Sincerely,



Susan Miller

c: Counsel of Record
Ms. Dawn Hipp